

Formal objection to SSD-78996460: Residential development with in-fill affordable housing, 16-24 Lord Street & 21-27 Roseville Avenue, Roseville

To Whom It May Concern,

I write to lodge my strong objection to State Significant Development (SSD) Application Number SSD-78996460, submitted by Hyecorp. This development is unfeasible in terms of local infrastructure, contravenes planning controls and heritage protections, and is grossly unreasonable, and misaligned with the suburb's structure, operation, and amenity, and the local community's values and expectations.

The application also represents systematic abuse of the transitional Transport Oriented Development (TOD) policy in rushing approval for a 30m+ building in an area where Ku-ring-gai Council's (Council) "Preferred Scenario" would classify it as R2 zoning with a 9.5m height limit, before negotiations between Council and the NSW Department of Planning, Housing and Infrastructure (DPHI) have been finalised.

Hyecorp is maximising their massive profits at an extreme cost to existing residents who face destruction to their everyday lives, neighbourhood and property value. Hyecorp claims community benefit, when in fact they would be devastating the existing community.

1. Procedural unfairness and lack of regard for local governance

Council is still in negotiations with the DPHI regarding a more suitable TOD framework for Gordon. Council's "Preferred Scenario", in response to the NSW Government's Low and Mid-Rise Housing Reforms, proposes measured growth that aligns with local infrastructure capacity, heritage conservation, and community expectations.

This application being lodged before this TOD framework is finalised undermines democratic planning processes, procedural fairness and represents an unacceptable dismissal of local governance.

2. Misuse of SSD intent

There is no legitimate reason for this proposal to be classified as "State Significant" as it doesn't demonstrate any extraordinary public benefit or strategic merit that would warrant bypassing Council assessment and community engagement. SSDs are for genuine state significant projects, not local residential developments. The proposal appears to have been structured for the SSD pathway, for example by the inflated development costs of \$148.6m, as a deliberate tactic to circumvent local planning controls.

3. Smokescreen re affordable housing

This proposal centres around affordable housing when in fact only 8 of the 259 units are affordable housing – certainly not justifying the destruction of amenity for the existing 200+ neighbouring homes and families. This is clearly profit maximisation and corporate greed disguised as social policy. The additional 40 classed as affordable housing are only temporary, for 15 years, after which the occupants will likely be displaced due to unaffordability (most units are likely to sell for \$800-1.5m+ and then there's 15 years worth of capital growth to add to the cost).

4. Traffic, access & parking crisis and gross understatement of car numbers

The proposed 344 car spaces and 728 bedrooms would see all 344 cars using Lord Street as the only access point, with 728 new residents generating daily congestion. Hyecorp's traffic assessment

states the completed development will only add 32-43 cars exiting into Lord Street in peak hours. However, based on legitimate calculations this is grossly understated and more like 233, as follows:

Using Hycorp's stated data, 56% of Roseville residents travel by car to work (as driver or passenger).

Census 2021 data states the average household size in Roseville is 2.9 people. 259 units x 2.9 people per household equates to 751 residents. Alternatively, 728 residents basing the calculation on the 728 bedrooms in the proposed units.

Census 2021 data states the following car ownership statistics in Roseville equating to the following car ownership in the proposed development:

- 6.2% of households have 0 cars = 16 units with 0 cars (total 0)
- 40.7% of households have 1 car = 105 units with 1 car (total 105)
- 37% of households have 2 cars = 96 units with 2 cars (total 192)
- 15.4% of households have 3+ cars (40 units with 3+ cars (total 120+)

Therefore estimated total new development car ownership = 417 cars.

Based on the 417 cars belonging to working adults, and 56% traveling to work by car, it's reasonable to expect 233 residents would be entering/exiting Lord Street during peak hours.

In addition, with 417 cars and only 309 car spaces provided, it's reasonable to assume there would be a 108 car overflow needing to park kerbside in surrounding streets, and these streets are already full.

Local roads and street parking are grossly insufficient to accommodate the resulting increase in vehicle movements. In particular:

- The subject pocket of Roseville is bordered by already severely congested main roads - Archbold, Pacific Highway and Boundary, and the access points cannot sustain increased traffic.
- Many households in Trafalgar Avenue and surrounds have children attending Roseville Public School on Archbold Road, and take the route down Trafalgar, left onto Roseville, right onto Martin Lane, left onto Lord, right onto Glencroft, left onto Bancroft – which would become unpassable. This would likely force traffic onto Clanville Road, where you can only turn left onto Archbold then immediately right – this pathway is already severely congested and a traffic increase would likely block traffic on Archbold heading north and result in cars backed all the way up Clanville Road.
- Hill Street to Boundary Street
- Clanville Road to Pacific Highway
- Clanville Road to Archbold Road
- Trafalgar Avenue to Roseville Avenue
- Roseville Avenue to Martin Lane
- Martin Lane to Lord Street
- Lord Street to Glencroft Avenue
- Lord Street to Archbold Road
- Lord Street to Hill Street
- Glencroft Avenue to Bancroft Avenue
- Bancroft Avenue to Archbold Road

- Bancroft Avenue to Hill Street

5. Health & access crisis during construction

The 2 year construction period's extreme hours of Mon-Fri 7am-8pm plus 8am-1pm on Saturdays would destroy the neighbourhood, making it unliveable in terms of vehicle movements and access. The demolition of 9 homes with 15m excavation would create a daily health risk with no escape route for Lord Street residents. Emergency services access would be severely compromised with safety hazards for pedestrians including children and elderly residents.

6. Catastrophic risks to Metro tunnel and adjacent properties

The 15m excavation proposed is directly adjacent to the underground Sydney Metro tunnel running under 14 Lord Street. The vibration from Metro trains plus construction risk the structural integrity of the tunnel and make the ground unstable with subsidence threatening neighbouring home foundations.

7. Misleading understatement of privacy invasion

Hyecorp's Environmental Impact Statement (EIS) shamelessly underplays the negative impact on the surrounding houses' privacy, including in Section 6.1.2.2, a rough illustration showing a 5 level development next to a house, instead of their proposed 9. The higher levels of the development are an unacceptable level of privacy invasion.

8. Non-compliance with proposed planning controls and excessive height

The proposed 9 storey building exceeds 30m, breaching the maximum building height of 9.5m under Council's Preferred Scenario for this area that would have R2 zoning. The excessive height and bulk is entirely inconsistent with the neighbour character and would dominate and destroy the streetscape and liveability for hundreds of neighbouring residents to an unacceptable degree.

9. Inhumane overshadowing and solar access loss

Section 6.1.2.1 of Hyecorp's EIS shows the building completely blocking the north-facing windows of all the houses on the other side of Lord Street from 2pm, extending to their backyards from 3pm. Many neighbouring properties would also be overshadowed by a 30m+ building with solar access loss creating a cooler, damper microclimate, and destroying garden health and solar panel use. This is an inhumane violation to the everyday lives of impacted homeowners.

10. Loss of outlook & devastating visual impact

Hyecorp's EIS rating is Moderate-Severe for neighbouring properties with 71% loss of sky view with a 30m+ building replacing a human-scale streetscape. This represents an unacceptable fundamental change to the living environment residents are invested in.

11. Public infrastructure overload

Local utilities are not designed for 728 additional residents with private development profits coming at the expense of additional public infrastructure costs associated with potentially failing stormwater and sewerage systems and a strained train station.

12. Destruction of the environment and loss of tree canopy

The development involves removing 89 trees, destroying the leafy streetscape character, and reducing air quality.

13. Irreparable destruction of Heritage

The subject site is within the Roseville Heritage Conservation Area (HCA) and would destroy the heritage streetscape and historic identity of the area.

14. Profit over planning principles

In selecting the subject site, Hyecorp appear to have prioritised cheaper and easier land acquisition over appropriate planning principles. There are critical reasons why this type of development would be more appropriately located around Hill Street or the Pacific Highway:

- Roseville station is still 300+ metres away and up a hill
- Roseville town centre with its commercial zoning is more appropriate for high-density development
- The proposed location is surrounded by family homes resulting in unacceptable living conditions during construction and following, with existing residents having chosen and likely paid a premium to live in a quiet area.

15. Lack of Good Urban Design Principles

The proposed building is incongruous with the neighbourhood character, violating core town planning principles, including those outlined in the NSW Urban Design Guide (2015) and Better Placed: An Integrated Design Policy, as follows:

- Contextual Incompatibility: The building's scale and bulk ignores the area's topography, established residential and heritage character.
- Amenity Impacts: There will be significant overshadowing, overlooking and loss of privacy to surrounding dwellings, with non-compliant setbacks.
- Public Domain Impact: The overdevelopment of the site will cause substantial visual clutter, lack of sunlight in the public domain, and degradation of pedestrian amenity.

In conclusion, this application fails every relevant planning test:

- It is non-compliant with Council's Preferred Scenario which should be the relevant planning control.
- It disregards the infrastructure, amenity and environmental needs of the community.
- It undermines public confidence in fair and transparent planning processes.
- It inflicts severe and permanent damage to Roseville's heritage and character.

For these reasons, I urge the NSW Department of Planning to refuse SSD-78996460 in full, and to support Ku-ring-gai Council's evidence-based, consultative planning approach for Gordon's future.

Sincerely,